



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 8  
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DENVER, CO 80202-2466  
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July 27, 2000

Ref: 8EPR-EP

Lee Kramer  
Acting District Ranger  
Brush Creek Ranger District  
Medicine Bow-Routt National Forests  
P.O. Box 249  
Saratoga, WY 82331

Re: Forest Road Special Use Permit for Logging on  
Wyoming School Lands, DEIS Review No. 000171

Dear Mr. Kramer:

In accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, Region 8 of the Environmental Protection Agency (EPA) has reviewed the *Draft Environmental Impact Statement (DEIS) for a Forest Road Special-Use-Permit for Access to State of Wyoming School Section 16 T12N, R83W, 6th P.M.* on the Medicine Bow-Routt National Forests, dated May 2000. We offer the following concerns and comments for your consideration as you complete the Final Environmental Impact Statement (FEIS). EPA's main concerns from reviewing the DEIS are improving the disclosure of impacts from the logging in Section 16 and improving mitigation for impacts on the roadless character of the area. Our comments are listed below.

1. The EIS needs to more fully disclose the cumulative impacts of logging and associated road construction in Section 16. From the limited information in the EIS, it appears most of the impacts will be from logging with limited impacts from the use of the Forest Service road. We understand that the Forest Service does not control logging on State school lands. However, the overall purpose and need of this action is to log nine timber units totaling approximately 165 acres in Section 16. For example, in "Table 2-1 Alternative Comparison Summary," the comparison of impacts is generally limited to only National Forest Service lands. The impacts from the logging should be included in the analysis for both the Proposed Action and Alternative 2. Another way to illustrate the difference in impacts is to add a fourth column listing the impacts of logging in section 16.

Most of the sections in Chapter 3 - Affected Environment and Environmental Consequences also do not fully disclose the impacts of logging in Section 16. In particular, the discussion of Threatened and Endangered Species and Fisheries should be revised to include a more thorough discussion of the impacts of the timber harvest. It is

not clear from the current discussion if the lynx, boreal toad or northern leopard frog will be impacted by the timber harvest and associated roads.

2. The NEPA (CEQ) regulations at 40 CFR 1502.16(h) require Federal agencies to discuss the means to mitigate adverse environmental impacts. The FEIS should disclose the mitigation measures to offset the impacts of adding logging roads and increased road use. The area surrounding Section 16 – Coon Creek RARE II – has been identified as high-value roadless and undeveloped area. Although Section 16 was not included in the Coon Creek RARE II, the section is within the exterior boundaries of the area. It appears from Map 1-1 “Forest Development Roads” that there are several nearby areas with roads (perhaps old logging roads) that could be reclaimed to maintain the overall roadless character of the area.

Based on the procedures EPA uses to evaluate the potential effects of proposed actions and the adequacy of the information in the DEIS, the environmental analysis for the *DEIS for Forest Road Special-Use-Permit for Access to State of Wyoming School Section 16 T12N, R83W, 6th P.M.* will be listed in the Federal Register in the category EC-2. This means that the review has identified environmental impacts that should be avoided in order to fully protect the environment, and the DEIS does not contain sufficient information to thoroughly assess environmental impacts. Enclosed is a summary of EPA’s rating definitions.

We appreciate your interest in our comments. Please contact Dana Allen at (303) 312-6870 if you have any questions about these comments.

Sincerely,

*Original Signed By*

Cynthia Cody  
Chief, NEPA Unit  
Office of Ecosystems Protection  
and Remediation

Enclosure

bcc: NEPA Tracking, EPA HQ  
Elaine Suriano, EPA HQ